

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

*This Motion Relates To:*

THE STATE OF TEXAS, *et al.*,

*Plaintiffs,*

- against -

GOOGLE LLC,

*Defendants.*

No. 21-CV-6841 (PKC)

**DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO SEAL  
LIMITED ITEMS IN THE SECOND AMENDED COMPLAINT**

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PLEASE TAKE NOTICE that, pursuant to the Court's Order dated September 7, 2021, ECF No. 142 at 2, Defendant Google LLC will seek an order before the Honorable P. Kevin Castel at a time and place convenient for the Court, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, permitting Plaintiffs to file a public version of the Second Amended Complaint, with narrowly tailored redactions, which are highlighted within the accompanying Exhibit A to the Declaration of Dan Taylor, in order to prevent the public disclosure of certain non-public information that will significantly harm the competitive interests of Google's business and the privacy interests of third parties.

Dated: September 17, 2021

Respectfully submitted,

/s/ Eric Mahr

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